## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ENID PÉREZ FIGUEROA, ET AL, Plaintiffs **CIVIL CASE NO.: 98-1942 (JAF)** 

vs.

MARIO A. TORRES RIVERA, ET AL, Defendants

## MOTION REQUESTING DISMISSAL OF THE COMPLAINT

TO THE HONORABLE COURT:

Now comes defendant Mario A. Torres Rivera through his undersigned attorney and to this Honorable Court respectfully states and prays:

- 1. This Honorable Court entered judgment on September 20, 1999, approving a "Joint Stipulation and Request for entry of Judgment".
- 2. Defendant has complied fully with the requests of the plaintiffs, indemnifying them in damages and by correcting the deficiencies on the title of the real property transmitted with plaintiffs, who agreed to maintain that property.

WHEREFORE, defendant requests this Honorable Court to enter a Judgment for the definite disposal of this case were all the claims made by plaintiff in her Complaint had been satisfied.

RESPECTFULLY SUBMITTED, in Caguas, Puerto Rico, March 15, 2006.

S/LUDWIG ORTIZ BELAVAL, ESQ. USDC No. 122813 Luis Muñoz Marín, Avenue 21 Street, X3 Mariolga Caguas, Puerto Rico 00725 Telephone Numbers (787) 286-6184, 366-9149 Email address johannlob@msn.com

## **CERTIFICATE OF SERVICE**

I herby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Plaintiff's attorney of record Diana López Feliciano.

S/LUDWIG ORTIZ BELAVAL, ESQ.